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REPLY TO NEW JERSEY OFFICE

October 21, 2020

By ECF

The Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Square  
New York, NY 10007

Re: United States v. Velez  
19 Cr. 862 (VEC)

Dear Judge Caproni:

As Your Honor is aware, I am counsel to Raimondo Nieves in the above-referenced matter. This correspondence is to respectfully request that the Court order the Metropolitan Detention Center Brooklyn ("MDC") to provide immediate medical attention for Mr. Nieves.

Mr. Nieves has presented with what the MDC medical records describe as "irregular shaped erythematous lesions" on his scalp, arms, back, lower abdomen, coccyx, legs and feet since December 21, 2019. He was provided topical ointments and shampoo, but has experienced only slight, temporary relief. The records indicate that Mr. Nieves should see a dermatologist. He has yet to see one in the ten months he has had the lesions. In addition to the discomfort he experiences, the skin condition is especially concerning to Mr. Nieves because he reports a family history for cancer.

More recently, Mr. Nieves is experiencing shortness of breath, which is exacerbated when he exercises. The MDC medical staff prescribed an albuterol inhaler for Mr. Nieves's asthma, but it has not alleviated his shortness of breath.

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Since December 21, 2019, Mr. Nieves has made numerous requests to MDC authorities for medical attention. While Mr. Nieves has received some treatment by the nursing staff — I do not believe he has been examined by a physician — the persistence of his symptoms over a sustained period requires that he be examined by specialists; a dermatologist for his skin conditions and a pulmonologist and cardiologist for his breathing issues.

Accordingly, we respectfully request that the Court order MDC to provide full medical testing and treatment performed by specialists for Mr. Nieves.

Respectfully submitted,

*/s/ Stephen Turano*

Stephen Turano  
Attorney for Raimundo Nieves

cc: Counsel for the Government (by ECF)

The Government is ordered to respond to Mr. Nieves's request by no later than **Wednesday, November 4, 2020**. The response should include a description of the medical care Mr. Nieves has received while detained at the Metropolitan Detention Center Brooklyn and whether he is scheduled to see a dermatologist and a pulmonary specialist.

SO ORDERED.



Date: October 21, 2020

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE